

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 23-11069 (CTG)  
)  
) (Jointly Administered)  
)  
)  
)  
**Re: Docket No. 575**

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**NOTICE OF FILING OF PROPOSED ORDER (I) APPROVING CERTAIN ASSET  
PURCHASE AGREEMENTS; (II) AUTHORIZING AND APPROVING SALES OF  
CERTAIN LEASED PROPERTIES OF THE DEBTORS FREE AND CLEAR OF LIENS,  
CLAIMS, INTERESTS, AND ENCUMBRANCES, IN EACH CASE PURSUANT TO  
THE APPLICABLE ASSET PURCHASE AGREEMENT; (III) APPROVING THE  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND  
UNEXPIRED LEASES IN CONNECTION THEREWITH, IN EACH CASE AS  
APPLICABLE PURSUANT TO THE APPLICABLE ASSET PURCHASE  
AGREEMENT; AND (IV) GRANTING RELATED RELIEF**

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**PLEASE TAKE NOTICE** that, on September 15, 2023, the Court entered that certain *Order (I)(A) Approving Bidding Procedures for the Sale or Sales of the Debtors' Assets; (B) Scheduling Auctions and Approving the Form and Manner of Notice Thereof; (C) Approving Assumption and Assignment Procedures (D) Scheduling Sale Hearings and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Lease; and (III) Granting Related Relief* [Docket No. 575] (the "Bidding Procedures Order").<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Bidding Procedures Order, the (i) Bid Deadline for the Debtors' Real Property Assets (including Owned Properties and Leased Properties) occurred on November 9, 2023 at 5:00 p.m. (E.T.), (ii) the Auction for such Real Property Assets (the "Real Estate Auction") commenced on November 28, 2023, at 9:00 a.m. (E.T.), and (iii) a Sale Hearing to consider the approval of Winning Bid(s) (and Back-Up Bid(s), as applicable) for such Real Property Assets is scheduled to take place on December 12, 2023 at 10:00 a.m. (E.T.).

**PLEASE TAKE FURTHER NOTICE** that on December 6, 2023, the Debtors filed the *Notice of Adjournment of Real Estate Auction for Certain Remaining Leased Properties to December 18, 2023 at*

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> Capitalized terms used in this notice but not defined herein shall have the meanings ascribed to them in the Bidding Procedures Order and Notice of Winning Bidders, as applicable.

9:00 a.m. (E.T.) [Docket No. 1284] and commenced the Auction for the Remaining Leased Properties on December 18, 2023.

**PLEASE TAKE FURTHER NOTICE** that on December 20, 2023, the Debtors filed *the Notice of Winning Bidders With Respect to Certain of the Debtors' Leased Properties* [Docket No. 1403] (the “Notice of Winning Bidders”) that reflected the Winning Bidders for the Won Leased Properties listed therein.

**PLEASE TAKE FURTHER NOTICE** that on December 20, 2023, the Debtors filed the *Notice of Rescheduled Sale Objection Deadline, Adequate Assurance Objection Deadline, and Sale Hearing for Certain of the Debtors' Leased Properties* [Docket No. 1406] providing notice of the Sale Hearing for the Lease Sales on January 12, 2024 at 2:00 p.m. (ET) and a related sale objection deadline for such Lease Sales on January 5, 2024 at 5:00 p.m. (ET)

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is the proposed *Order (I) Approving Certain Asset Purchase Agreements; (II) Authorizing and Approving Sales of Certain Leased Properties of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, in Each Case Pursuant to the Applicable Asset Purchase Agreement; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, in Each Case as Applicable Pursuant to the Applicable Asset Purchase Agreement; and (IV) Granting Related Relief* (the “Proposed Sale Order”) seeking authorization, among other things, to enter into respective Asset Purchase Agreements for the Lease Sales. The applicable Asset Purchase Agreements (as defined in the Sale Order) are in the process of being finalized and filed.

**PLEASE TAKE FURTHER NOTICE** that the Debtors intend to present the Proposed Sale Order at the Sale Hearing on January 12, 2024 at 2:00 p.m. (ET).

Dated: December 29, 2023  
Wilmington, Delaware

*/s/ Peter J. Keane*

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